

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

Marion Andrew Humphrey, Jr.,

Plaintiff,

v.

Steven Payton, acting in his individual capacity as an Arkansas State Police trooper,

Defendant.

Case No. 4:21-CV-00194 LPR

**JOINT MOTION FOR APPROVAL
OF SETTLEMENT**

Plaintiff Marion Andrew Humphrey, Jr., and Defendant Steven Payton, for their joint motion for approval of settlement, state:

1. On April 24, 2023, the parties executed a settlement agreement on Mr. Humphrey's underlying claims. In short, Mr. Humphrey agreed to dismiss his claims against Trooper Payton, the Arkansas State Police (ASP) agreed to pay Mr. Humphrey \$35,000, and the parties agreed to mediate the issue of costs, including attorneys' fees.

2. On June 8, 2023, the parties mediated before Magistrate Judge Volpe the costs, including attorneys' fees, and agreed to settle the issue for \$232,500.

3. The parties request the Court to enter an order approving the entire settlement on Mr. Humphrey's claims and costs, including attorneys' fees.

4. Upon approval, the ASP will initiate its internal procedures for payment of the settlement: one check for \$35,000 to Mr. Humphrey and a second check for \$232,500 written to Robins Kaplan LLP IOLTA Trust Account.

5. After Mr. Humphrey receives complete payment, he will file a motion for dismissal within seven calendar days.

WHEREFORE, the parties jointly ask the Court to approve the terms of the settlement and grant their joint motion.

ROBINS KAPLAN LLP

Robert Bennett, pro hac vice
Andrew J. Noel, pro hac vice
Marc E. Betinsky, pro hac vice
Greta A. Wiessner, pro hac vice
800 LaSalle Ave, Suite 2800
Minneapolis, MN 55402
(612) 349-8500
rbennett@robinskaplan.com anoel@robinskaplan.com
mbetinsky@robinskaplan.com
gwiessner@robinskaplan.com

-and-

ELDRIDGE BROOKS, PLLC

Conner Eldridge, Ark. Bar No. 2003155
Emily Neal, Ark. Bar No. 2003087 5100
West J.B. Hunt Drive
Suite 840
Rogers, AR 72758
(479) 553-7678
conner@eldridgebrooks.com
emily@eldridgebrooks.com
Attorneys for Plaintiff

-and-

TIM GRIFFIN

Attorney General of Arkansas

Noah P. Watson, Ark. Bar No. 2020251
Senior Assistant Attorney General
Justin Brascher, Wash. Bar No. 58371
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
Phone: (501) 682-1019
noah.watson@arkansasag.gov
justin.brascher@arkansasag.gov
Attorneys for Defendant